Response Under 37 C.F.R. § 1.111
U.S. Appln. No.: 09/512,560

Attorney Docket # A8643 /
ST9-99-153

REMARKS

Applicant thanks the Examiner for withdrawing the rejections of record in the

April 21, 2004 Final *Office Action*.

Status of the Application

All of the pending claims 1-30 in the instant Application stand rejected.

Obviousness Rejection

Claims 1-30 are rejected under 35 U.S.C. § 103(a) as being unpatentable over W3C's

"*Introduction to CSS2*," (http://www.w3.org/TR/REC-CSS2/intro.html#processing-model;

hereinafter "*Intro to CSS2*") in view of *Traughber et al.* (WO 98/14896; hereinafter

"*Traughber*"). This rejection is respectfully traversed.

It is alleged in the instant *Office Action* that *Intro to CSS2* discloses many of the features

recited in independent claims 1, 11 and 21. But the *Office Action* also concedes that *Intro to*

CSS2 fails to teach or suggest "that customizing a requested document is done on the server side"

(O.A., pg. 3). In an attempt to show that these claimed features were known, the Examiner

applies *Traughber*, taking the position that this secondary reference discloses "that customizing

the requested document can be done on the server side (Page 2, lines 3-14)(Fig. 2: 32)" (O.A.,

pg. 3).

Applicant respectfully submits that *Intro to CSS2* and *Traughber*, taken alone or in

combination, fail to teach or suggest that the claimed feature of applying "at least one rule of the

style sheet to the DOM" <u>is performed within a document server (Claim 1) or system (Claim 11)</u>, where the style sheet rule is directed to a target device, as recited in independent claims 1 and 11. Likewise *Intro to CSS2* and *Traughber* fail to teach or suggest an article of manufacture, as recited in Claim 21, having similar features.

Specifically, while *Intro to CSS2* discloses that it utilizes style sheets, it specifies that the style sheets are applied to a parsed source document <u>at the client (*i.e.*, user or target) side</u>, rather than at the recited server or system side. This configuration described in *Intro to CSS2* is similar to the deficient "relevant technology" discussed on pages 1-5 of the instant Application. Therefore, it is respectfully submitted that the *Intro to CSS2* system would suffer from the <u>same</u> <u>problems as the "relevant technology" described in the background section of the Application</u>, *i.e.*, many "user agents" (*i.e.*, web browsers) do not support style sheets.

Traughber fails to correct the deficiencies of *Intro to CSS2*, as it fails to teach or suggest application of style sheets at a server or system side. Rather, *Traughber* discloses that a web server may retrieve a template from memory to <u>create a new HTML page,</u> which is then parsed and processed to <u>embed data</u> therein (pg. 5, lines 17-23). Thus, *Traughber* is directed to the preparation of a new HTML page, and the insertion of specific data therein, and not the customization of a web page for a target device, as alleged in the Office Action.

Further, even if the *Traughber* method could be read as somehow customizing an HTML page for a particular target device (which Applicant does not concede), such an overly broad

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interpretation <u>still</u> would fail to teach or suggest the <u>recited</u> features, as *Traughber* is simply silent on the application of style sheets to a DOM on a server (or system) side. In fact, *Traughber* is completely silent regarding any use of any style sheet.

Therefore, the instant *Office Action* cannot reasonably support the position that independent claims 1, 11 and 21 are obvious, because "to establish *prima facie* obviousness of the claimed invention, all the claim limitations must be taught or suggested by the prior art." *In re Royka*, 490 F.2d 981 (CCPA 1974).

Thus, Applicant respectfully submits that independent claims 1, 11 and 21 are patentable over the applied references. Further, Applicant respectfully submits that rejected dependent claims 2-10, 12-20 and 22-30 are allowable, *at least* by virtue of their dependency.

Thus, Applicant respectfully requests that the Examiner withdraw this rejection.

Conclusion

In view of the foregoing, it is respectfully submitted that claims 1-30 are allowable. Thus, it is respectfully submitted that the application now is in condition for allowance with all of the claims 1-30.
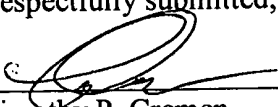
If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

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Please charge any fees which may be required to maintain the pendency of this

application, except for the Issue Fee, to our Deposit Account No. 19-4880.

Respectfully submitted,

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